

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: § Case No. 23-30960 (jpn)
§
Sourcewater, Inc. dba Sourcenergy, §
§
Debtor. § Chapter 11
§ Subchapter V

**SUPPLEMENTAL DECLARATION OF MICHAEL K. RIORDAN ON BEHALF
OF CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS, & AUGHTRY
PURSUANT TO 11 U.S.C. § 327 AND BANKRUPTCY RULES 2014 AND 2016**

I, MICHAEL K. RIORDAN, HEREBY DECLARE, PURSUANT TO 28 U.S.C. § 1764, AS FOLLOWS:

1. This supplement is being provided to the Declaration of Jarrod B. Martin¹ (“Martin Declaration”) pursuant to 11 U.S.C. § 327(A) and Bankruptcy Rules 2014 and 2016 made in conjunction with the Application to Employ Chamberlain, Hrdlicka, White, Williams & Aughtry (“CHWWA”)² as general bankruptcy counsel for the above-referenced Debtor.

2. On May 1, 2023, I joined CHWWA as Special Counsel. Under my contract with CHWWA, I am an independent contractor and not an “employee” of CHWWA. I am paid a fixed hourly rate for the hours that I work on a matter instead of receiving a set salary. I pursued and entered into this relationship with CHWWA to have greater flexibility in my work hours and scheduling. Aside from my status as an independent contractor,

¹ ECF No. 34-1.

² ECF No. 34.

being paid hourly rather than a salary, and the greater flexibility in my work hours, my role on CHWWA matters, the level and complexity of work that I am doing, and my integration into CHWWA is essentially the same as it was with the prior firms I worked for as a W-2 employee between 2011 and 2022: Foley & Lardner, LLP (as Special Counsel); Gardere Wynne Sewell, LLP (as Associate); and Weil Gotshal & Manges, LLP (as Associate). CHWWA has hired me to be a senior attorney in their Bankruptcy, Restructuring, and Creditor Rights Practice working on wide variety of matters on an ongoing basis, not just for a specific project or projects.

3. In addition, both I and CHWWA hold me out as a CHWWA attorney. Among other things:

- a. I am covered by CHWWA's malpractice insurance policies for every matter I work on at CHWWA;
- b. I have been given the title of "Special Counsel" at CHWWA, the same title I had while a W-2 employee at my prior law firm;
- c. I utilize a chamberlainlaw.com email address;
- d. My signature block identifies me as a CHWWA attorney;
- e. I have a profile on the CHWWA website;
- f. I will utilize CHWWA business cards;³
- g. I am identified as working for CHWWA on the website of the State Bar of Texas; and
- h. I am not working with any other law firms, or working independently, and I do not intend to do so while working for CHWWA, but I will notify the Court promptly through a supplemental declaration in the event that I do ever contract to work for another firm or take on work independently while I am working for CHWWA.

³ It is my understanding that CHWWA is in the process of having business cards created for me.

4. For the foregoing reasons, I believe that I constitute a “regular associate” as that term is used in Bankruptcy Rules 2014(b) and 2016 (a) and (b), and IN section 504(b) of the Bankruptcy Code because a “regular associate” is “any attorney regularly employed by, associated with, or counsel to an individual or firm.” Fed. R. Bankr. P. 9001(10).

5. In addition, to the best of my knowledge, I do not represent any parties adverse to the estate in the matters upon which CHWWA has been engaged by the Debtor, and I have no connections with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee except as otherwise disclosed in the Martin Declaration or herein.

6. Furthermore, to the best of my knowledge:
 - a. I am not a creditor, equity security holders or insider of the Debtor;
 - b. I am not and have not been, within two years before the date of the filing of the petition, a director, officer, or employee of the Debtor; and
 - c. I do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor or for any other reason.

7. I further state that I will be compensated by CHWWA for the work I perform for CHWWA in connection with this case on a flat hourly rate in accordance with the contract between CHWWA and myself.

8. In connection with CHWWA’s continuing duty to supplement its disclosures, this Declaration supplements the declarations filed previously.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 25, 2023

Respectfully submitted,

**CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, P.C.**

/s/ Michael K. Riordan

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